

Permit Conditions

Modified Condition 2.2 limits the facility-wide emission of single and combined HAP emissions to no more than 10 and 25 tpy, respectively, for avoidance of 40 CFR 63 Subpart B. The referenced rule has been updated.

Modified Condition 2.3 requires the facility to operate the wet ESP's, regenerative thermal oxidizer, and biofilter at all times while their associated emission units are operating. This Condition applies to both Phases. Condition 2.3 was modified to include the RTO as a control device in Phase I.

In addition to the WESP's in Condition 2.3, modified Condition 2.4 requires the facility to operate all baghouses and cyclones at all times while their associated emission units are operating. This Condition applies to both Phases.

The wording in Modified Condition 2.5 has been changed to apply it to the energy system in Phase I and dryer burners in Phase II. Since they all burn wood which contains minimal amount of sulfur, the GA Rule (g) fuel sulfur content limit is subsumed.

The wording in Modified Condition 2.6 has been changed to explicitly apply it to both Phases.

The Division suspects that burning wood will generate some hexavalent chromium [Cr(VI)] while the facility claimed that burning virgin wood would not emit Cr(VI). In order to avoid the modeling requirements for Cr(VI), the facility-wide Cr(VI) emission rates must stay below the associated minimum emission rate (MER). In another wood industry project, the Division learned that wood combustion would not emit Cr(VI) mist; rather, it is just the Cr(VI) in the wood being released in the atmosphere in the form of particulates. Therefore, the correct MER value for Cr(VI) (particulate) has been updated in Condition 2.10.

Condition 2.11 has been modified to include the revised conditions in Sections 5, 6, and 7 of the permit that only apply to the Phase I emission units.

New Condition 2.12 subjects the facility's fuel-burning equipment (ID No. BLR) to Georgia Rule (d) PM emission limit and visible emission limit. This Condition applies to both Phases.

Modified Condition 4.2 requires the facility to maintain the combustion zone temperature of the RTO at or above the minimum temperature set point established in the most recent performance tests. Before the initial performance test is conducted, the temporary minimum temperature set point is set as 1,500°F. 1,500°F is the typical RTO combustion zone temperature set point EPD uses before a performance test is conducted.

Modified Condition 5.2a. requires the facility to install, calibrate, maintain, and operate a VOC CEMS at the biofilter (ID No. BIO) outlet.

Modified Condition 5.2b. requires the facility to install, calibrate, maintain, and operate a temperature indicator at the RTO combustion zone. The temperature monitoring must be continuous.

Existing Conditions 5.3 through 5.7 have been modified to apply to the revised emission units, control devices, and the associated ID numbers.